

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROYCE CORLEY,

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Plaintiff,

v.

S.D. OF N.Y.  
15 Civ. 9621  
(Failla, J.)

HON. BONNIE G. WITTNER, et al.,

Defendants.

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DATE FILED: 1-28-19

ADDENDUM TO THE MEMORANDUM OF LAW

Plaintiff ROYCE CORLEY, acting pro se, hereby submits this addendum to supplement and correct matters which were inadvertently omitted from the original MEMORANDUM OF LAW (Dkt. #117) as follows--

(1) Sections 1(I)(B) ("Judicial Immunity") and 1(III)(M) ("Prosecutorial Immunity") should have included a passage on the "Doctrine of Unclean Hands" as stated herein:

Judge Wittner and DANY are further estopped from asserting an absolute immunity defense under the "principle, known as the 'doctrine of unclean hands,' [for which] the equitable powers of this court can never be exerted on behalf of one who has acted fraudulently, or who by deceit or any unfair means has gained an advantage. To aid a party in such a case would make this court the abetter of iniquity." CBF Industria de Gusa v. AMCI Holdings, Inc., 850 F.3d 58, 78 (2d Cir. 2017).

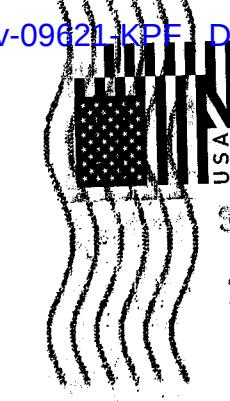
(2) Section 1(III)(N) ("Personal Involvement") has an incomplete sentence which should read (p. 19):

"It could also be inferred from the circumstances that Cyrus Vance at the minimum acquiesced to using an underage prostitute-informant: as no sane prosecutor would knowingly violate N.Y. Penal Law § 230.34(5)(g) without confirmation from their superior that they would not be prosecuted or disciplined for their actions."

Dated: January 22, 2019  
Petersburg, VA

PLAINTIFF  
Royce Corley, pro se  
P.O. Box 1000, Petersburg, VA 23804-1000

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